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11 Attorneys for Defendants
UBER TECHNOLOGIES, INC.,
12 OTTOMOTTO LLC, and OTTO TRUCKING LLC

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16 WAYMO LLC,
17 Plaintiff,
18 v.
19 UBER TECHNOLOGIES, INC.,
20 OTTOMOTTO LLC; OTTO TRUCKING LLC,
21 Defendants.

Case No. 3:17-cv-00939-WHA

**CORRECTED DECLARATION OF
WENDY J. RAY IN SUPPORT OF
UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC, AND OTTO
TRUCKING LLC'S
ADMINISTRATIVE MOTION TO
ALLOW SAMEER KSHIRSAGAR
ACCESS TO CERTAIN MATERIAL**

Complaint Filed: February 23, 2017
First Am. Compl. Filed: March 10, 2017
Trial Date: October 2, 2017

1 I, Wendy J. Ray, declare as follows:

2 1. I am a partner with the law firm of Morrison & Foerster LLP. I am a member in
3 good standing of the Bar of the State of California. I make this declaration based on personal
4 knowledge and, if called as a witness, I could and would testify competently to the matters set
5 forth herein. I make this declaration in support of Uber Technologies, Inc., Ottomotto LLC, and
6 Otto Trucking LLC's (collectively "Uber") Administrative Motion to Allow Sameer Kshirsagar
7 Access to Certain Material.

8 2. Attached hereto as Exhibit 1 is a true and correct copy of an email chain between
9 Arturo González and counsel for Waymo LLC ("Waymo") at Quinn Emanuel dated March 20,
10 2017, at 11:26 a.m. requesting that counsel for Waymo agree to allow counsel for Uber to show
11 Mr. Kshirsagar the five files Waymo alleges he downloaded.

12 3. On March 20, 2017, at 2:00 p.m., I met and conferred telephonically with counsel
13 for Waymo. I requested that counsel for Waymo agree to allow counsel for Uber to show
14 Mr. Kshirsagar the file names of the files at issue. Counsel for Waymo agreed in writing to this
15 request on March 21, 2017, at 8:11 p.m., but did not agree that counsel for Uber could show
16 Mr. Kshirsagar the files themselves.

17 4. Attached hereto as Exhibit 2 is a true and correct copy of an email chain between
18 Arturo González and counsel for Waymo. On March 21, 2017, at 10:24 p.m., Arturo González
19 again asked counsel for Waymo if they would agree to allow counsel for Uber to show Mr.
20 Kshirsagar the five files, not just file names, that Waymo alleges he downloaded. On March 22,
21 2017, at 2:55 p.m., Arturo González requested that counsel for Waymo agree to allow counsel for
22 Uber to show Mr. Kshirsagar the transition memorandum he prepared when he departed from
23 Waymo. Waymo has not responded.

24 5. Attached hereto as Exhibit 3 is a true and correct copy of Exhibit A to Patent Local
25 Rule 2-2 Interim Model Protective Order that currently applies in this case, executed by Sameer
26 Kshirsagar.

1 I declare under the penalty of perjury under the laws of the United States that the
2 foregoing is true and correct. Executed this 23rd day of March, 2017, in Los Angeles, California

3
4 /s/ Wendy J. Ray

Wendy J. Ray

5
6 **ATTESTATION**

7 I, Arturo J. González, am the ECF User whose ID and Password are being used to file this
8 document. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Wendy J. Ray concurs in
9 this filing.

10 Dated: March 23, 2017

MORRISON & FOERSTER LLP

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12 By: /s/ Arturo J. González

13 ARTURO J. GONZÁLEZ
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